

**STATEMENT OF  
COMMISSIONER MICHAEL J. COPPS**

Re: *Proposed Extension of Part 4 of the Commission's Rules Regarding Outage Reporting to Interconnected Voice Over Internet Protocol Service Providers and Broadband Internet Service Providers*, PS Docket No. 11-82

Today we launch an important inquiry that recognizes the changing landscape of communications and its role in public safety, and in so doing we take another step toward fulfilling the recommendations of the National Broadband Plan. We're reminded again in recent weeks how critical communications are in times of crisis. Increasingly, we rely on IP-based services to make our emergency calls and to obtain critical information. A significant portion of our residential phone connections – more than a quarter, we are told – are now using interconnected VoIP, so there is no question just how much VoIP and broadband are on the front lines to protect citizens in this dangerous Twenty-first century world we all live in. Today's item addresses these changes.

Our current rules – limited to traditional voice services – have enabled critical outage analysis that in turn promotes industry best practices that ultimately – or at least hopefully – have led to fewer outages. So we salute past and ongoing industry efforts, knowing that service providers are concerned about the reliability and security of their most cutting-edge networks. To that end, I look forward to learning more about what they are doing on their own.

Today's item acknowledges the unique characteristics of these networks, and proposes to tailor outage reporting rules to those characteristics. While it's true that IP is designed to be "fault tolerant," we can – and have – seen outages that affect hundreds of thousands of people for hours at a time. So, in addition to network operators, I look forward to hearing from other stakeholders, including the public safety community, on where we should set the triggers for reporting.

Finally, this is not the first time that we have considered the ancillary authority route to take important steps to protect users of these services. I would be remiss if I didn't say this is not my preferred approach, and I hope that one day soon the Commission will look more broadly at the proper classification of Voice over Internet Protocol. Our charge to protect the safety of the American people is clear and should never have to hinge on semantics or distinctions without a difference. Nevertheless, I am hopeful that we will be able to find the support we need to take the necessary steps in this critical arena.

I want to thank the Chairman and Public Safety and Homeland Security Bureau for bringing us this Notice. It shows that we take seriously our charge as an agency with significant public safety responsibilities.